

15,1
10/07/02

The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION
PHONE (208) 478-3903
(208) 478-3907
FAX: (208) 478-3909



HAZARDOUS WASTE PROGRAM
P. O. BOX 306
FORT HALL, IDAHO 83203

RECEIVED

OCT 09 2002

OFFICE OF WASTE
& CHEM. MGMT.

October 7, 2002

Linda Meyer(MS-121)
Project Coordinator
U.S. EPA, Region X
1200 Sixth Avenue
Seattle, WA 98101

Subject: Dewatering Pit Sampling and Analyses Plan to Support Remedial Design: Simplot

The Shoshone-Bannock Tribes' CERCLA/RCRA Program appreciates the opportunity to comment on the above referenced Plan by Simplot.

The purpose of the Plan is determine if any of the material, to be excavated from the pits exhibit the Toxicity Characteristic, as determined by the TCLP test, or pose unacceptable risks to the workers or public.

It is proposed that a single composite sample be collected from each of the three pits. As reported on page 5: "The sampling is designed to represent the average characteristic in each of the three pits, and will be assessed using the TCLP test." If the concentrations are below the values shown in Table I, the material will be moved to the gypsum stacks.

According to the Plan, the visual inspection of the pits shows no layering and is assumed to be homogeneous. We disagree that lack of observed layering be the sole criteria for determining that the solids within the pits are homogeneous, and believe that additional analytical sampling is a better method to determine the depth of contaminants if concern in these pits.

Also the sampling plan apparently uses visual determination to determine that residual solids are limited to 5 inches in depth in the West pit, 14 inches in the East pit, and one-half inch in the South pit (This methodology contradicts the lack of observed layering reported above: how was the residual solid depth determined, and why is it assumed that phosphorous compounds or other



contaminants remain in this upper residual area?). Simplot proposes to sample only in this top visually determined layer in each case.

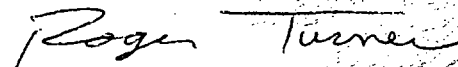
Simplot also proposes to sample only three locations in the South pit, and five locations in the larger East and West pits, then from these composite the sampling for a total of three samples (500 gm each) to be sent to the laboratory.

The number of samples appears totally inadequate. The limited sampling proposed cannot reasonably represent the average characteristic in each of the three pits, nor form the basis for remedial design. The total volume of the dirt projected to be moved to the gypsum stack is 6,800 cubic yards. If the material is comparable to the mass of sandy loam it would weigh over 8 million pounds. Assuming each grab sample averages a pound, the sampling amounts to less than 1 part per million sampled. Sampling is not proposed for the berm areas, even though they were constructed from solids within the dewatering pit area, and there is no discussion regarding the possibility of the berms accumulating phosphorous compounds. Analyses of the samples should include metals and fluoride to determine concentrations of these constituents in the pit areas. The limited sampling proposed will not adequately determine if hazardous waste "hot-spots" are in these pits, which may change the remedial action plan. There is no sampling proposed off-site from these pits. It is quite common that fugitive dust could carry the pit solids off of the pit perimeters, before or during the excavation. The Plan should be revised to sample surface areas, surrounding these pits, within a 100 meter perimeter, especially downwind from the prevailing wind direction, with a plan to revise the remedial plan accordingly.

Consequently we support additional TCLP sampling than that proposed. We suggest 15-20 sampling sites per pit, and that a few samples of the berm area be included. A reasonable number of the samples should be analyzed individually for the TCLP test to determine if some areas have concentrated levels of hazardous compounds. In each case, mid-pit samples should be sampled and tested. Perimeter surface soil samples should be carried out as described above to determine if pit-solids have been distributed by fugitive dust.

Thank-you for your consideration in reviewing these comments.

Sincerely,



Roger Turner
Interim CERCLA/RCRA Manager

cc: Ward Wolleson, Senior Environmental Engineer, Simplot
Alonzo Coby, Interim Land Use Director
File